

OFFICER GREGORY SCHAFFER 10/16/2020

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1 IN THE UNITED STATES DISTRICT COURT
2 EASTERN DISTRICT OF MISSOURI
3 EASTERN DIVISION
4 --o0o--
5 LINDSAY LAIRD and ANDRE)
 ROBERTS,)
6)
 Plaintiffs,)
7)
 vs.) Cause No. 4:18-cv-01567 (AFG)
8)
 CITY OF SAINT LOUIS, et)
9 al.,)
)
10 Defendants.)
 _____)

11
12 VIDEO-RECORDED VIDEOCONFERENCE DEPOSITION OF
13 OFFICER GREGORY SCHAFFER
14 October 16, 2020
15
16
17 (Beginning at 1:16 p.m.)
18
19
20
21
22
23
24
25

Exhibit H

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1 (The original exhibits, excluding Exhibit 13, were
2 provided electronically to the court reporter to be
3 attached to the original and copies of the
4 transcript.)

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14 VIDEO-RECORDED VIDEOCONFERENCE DEPOSITION
15 OF OFFICER GREGORY SCHAFFER, produced, sworn, and
16 examined on Friday, October 16, 2020, taken on behalf
17 of the Plaintiff at the offices of Alaris Litigation
18 Services, 711 North 11th Street, in the City of St.
19 Louis, State of Missouri, before RENEE COMBS QUINBY,
20 a Certified Court Reporter (MO) #1291, Certified
21 Shorthand Reporter (IL) #084-004867, Certified
22 Shorthand Reporter (CA) #11867, Certified Shorthand
23 Reporter (AR) #821, Registered Diplomat Reporter,
24 Certified Realtime Reporter, and a Notary Public
25 within and for the State of Missouri.

OFFICER GREGORY SCHAFFER 10/16/2020

Page 5

1 A P P E A R A N C E S

2 FOR THE PLAINTIFF:

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6 St. Louis, MO 63102
7 (855) 724-2489
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9 and

10 Kiara N. Drake, Esq. (via videoconference)
11 Javad M. Khazaeli, Esq. (via videoconference)
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26 THE VIDEOGRAPHER:

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29 711 North 11th Street
30 St. Louis, MO 63101
31 (800) 280-3376

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1 COURT REPORTER:

2 Renee Combs Quinby, RDR, CRR

3 Missouri CCR #1291

4 Illinois CSR #084-004867

5 California CSR #11867

6 Arkansas CSR #821

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2 IT IS HEREBY STIPULATED AND AGREED by and
3 between counsel for the Plaintiff and counsel for
4 the Defendants that this deposition may be taken in
5 machine shorthand by RENEE COMBS QUINBY, a Certified
6 Court Reporter and Notary Public, and afterwards
7 transcribed into typewriting and the signature not
8 reserved by agreement of counsel and consent of the
9 witness.

10 --oOo--

11 P R O C E E D I N G S 1:16 p.m.

12 --oOo--

13 THE VIDEOGRAPHER: We're on the record.
14 Today's date is October 16th, 2020, and the time is
15 1:17 p.m.

16 This is the video-recorded deposition
17 of Officer Gregory Schaffer in the matter of
18 Lindsay Laird and Andre Roberts versus City of
19 St. Louis, case number 4:18-CV-01567 (AFG) in the
20 United States District Court, Eastern District of
21 Missouri, Eastern Division.

22 This deposition is being held at remote
23 locations. The reporter's name is Renee Quinby. My
24 name is Shaun Steele. I'm the certified legal
25 videographer, and we're with Alaris Litigation

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1 Services.

2 Would the attorneys present please
3 introduce themselves and the parties they represent.

4 MS. DRAKE: Kiara Drake for plaintiffs.

5 MR. LAIRD: Brandon Laird for the
6 defendants.

7 THE VIDEOGRAPHER: Would the court
8 reporter please swear in the witness.

9 OFFICER GREGORY SCHAFFER,
10 of lawful age, having been first duly sworn to
11 testify to the truth, the whole truth, and nothing
12 but the truth in the case aforesaid, deposes and
13 says in reply to oral interrogatories propounded as
14 follows, to-wit:

15 --oOo--

16 EXAMINATION

17 BY MS. DRAKE:

18 **Q. All right. Good afternoon,**
19 **Officer Schaffer. My name is Kiara Drake. I'll be**
20 **taking your deposition.**

21 A. Good afternoon, Ms. Drake.

22 **Q. I want to kind of give you some ground**
23 **rules because we're using Zoom. So it's going to be**
24 **a little bit different than it would be if we were**
25 **here in person, but there may be some delay or some**

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1 Q. How long were you there?

2 A. Two, three hours maybe.

3 Q. Did you respond to the protest on the
4 day of the verdict?

5 A. Yes.

6 Q. Where was that?

7 A. We responded to a couple of them.

8 First one would be the one directly outside the
9 police academy, and then the other one would be at
10 Lyda Krewson's house, Mayor Krewson's.

11 Q. Did you make any arrests that day?

12 A. Yes.

13 Q. How many?

14 A. One that I remember.

15 Q. Do you recall who you arrested?

16 A. No.

17 Q. Do you recall what you arrested that
18 person for?

19 A. I believe she was responsible for
20 throwing a -- it looked like a piece of concrete,
21 broken up concrete, through the bus window that we
22 were sitting on.

23 Q. And which location was this at?

24 A. It was on Tucker directly outside the
25 police academy outside on the street.

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1 Q. Do you recall what time of day this
2 was?

3 A. Around noon.

4 Q. And what was the charge?

5 A. I'm not sure.

6 Q. Did you use any force?

7 A. No.

8 Q. Did you witness any other arrests that
9 day?

10 A. Yes.

11 Q. How many?

12 A. Quite a few. I'm not sure.

13 Q. Do you know the names of any of those
14 arrestees?

15 A. No.

16 Q. Do you know which officers arrested
17 those persons?

18 A. I would have had no clue except we
19 watched the video the other day. I saw
20 Jerry Thacker arrested somebody.

21 Q. What location did he arrest someone at?

22 A. It was right outside the police
23 academy.

24 Q. Was this also around noon?

25 A. It was approximately. It was the --